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October 21, 2024

Lisa J. Stevenson
Acting General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

RE: Complaint Against the Labour Party of the United Kingdom and Harris for President for Making and Accepting Illegal Foreign National Contributions

Dear Ms. Stevenson:

When representatives of the British government previously sought to go door-to-door in America, it did not end well for them. This past week marked the 243 anniversary of the surrender of British forces at the Battle of Yorktown, a military victory that ensured that the United States would be politically independent of Great Britain.¹ It appears that the Labour Party and the Harris for President campaign have forgotten the message.

I write on behalf of Donald J. Trump for President 2024, Inc. to request an immediate investigation into blatant foreign interference in the 2024 Presidential Election in the form of apparent illegal foreign national contributions made by the Labour Party of the United Kingdom and accepted by Harris for President, the principal campaign committee of Vice President Kamala Harris.

I. Factual Background

The Washington Post reports, “[s]trategists linked to Britain’s Labour Party have been offering advice to Kamala Harris about how to earn back disaffected voters and run a winning campaign from the center left.”² The Telegraph adds more detail to these statements, reporting “Morgan McSweeney, the Prime Minister’s chief of staff, and Matthew Doyle, director of communications, attended the convention in Chicago and met with Ms Harris’ campaign team”

¹ See *Yorktown: Siege of Yorktown*, American Battlefield Trust, <https://www.battlefields.org/learn/revolutionary-war/battles/yorktown#:~:text=Virginia%20%7C%20Sep%2028%20%2D%20Oct%2019,the%20United%20States%20of%20America>.

² Karla Adam, *U.K. Labour strategists advise Harris on winning from the center left*, Wash. Post (Sept. 14, 2024), <https://www.washingtonpost.com/world/2024/09/14/uk-labour-kamala-harris-election-strategy/>.

and “Deborah Mattinson, Sir Keir’s director of strategy, also went to Washington in September to brief Ms Harris’ presidential campaign on Labour’s election-winning approach.”³

In the wake of these strategic meetings, the Harris campaign has been following in the footsteps of then-Senator Joseph Biden by generously borrowing language and themes from prominent Labour Party officials:⁴

The Harris campaign appears to be mirroring much of Starmer’s language in its slogans and advertisements. The Labour Party attacked conservatives with slogans like “stop the chaos” and “turn the page” while Harris has used language like “we’re not going back” and “it’s time to turn the page.”⁵

In addition, just this past week, Sofia Patel, the head of operations for the Labour Party, stated in a now-apparently-deleted post on LinkedIn:⁶



The Telegraph reports that Ms. Patel further emailed Labour staff on August 2, 2024, and asked “if anyone would be willing to travel to the US to ‘help our friends across the pond elect

³ Dominic Penna & Tony Driver, *Republicans ‘outraged’ as Labour sends 100 staff to help Harris*, Telegraph (Oct. 17, 2024), <https://www.telegraph.co.uk/politics/2024/10/17/labour-sends-staff-help-democrats-us-election-kamala-harris/>.

⁴ See Olivia B. Waxman, *Why Joe Biden’s First Campaign for President Collapsed After Just 3 Months*, Time (Aug. 2, 2019), <https://time.com/5636715/biden-1988-presidential-campaign/>; <https://time.com/vault/issue/1987-09-28/page/25/>.

⁵ Jackson Walker, *British Labour Party sending staff to campaign for Harris in US swing states*, WJLA (Oct. 17, 2024), <https://www.wjla.com/news/nation-world/british-labour-party-sending-staff-to-campaign-for-harris-in-us-swing-states-united-kingdom-uk-left-leaning-kamala-harris-2024-election-democratic-party-north-carolina-pennsylvania>.

⁶ Screenshot from: <https://x.com/PoliticsUK/status/1846859483428856266>.

their first female president” and “[l]et’s show those Yanks how to win elections!”⁷ Ms. Patel further indicated “she plans to arrive in the U.S. two weeks prior to the election and stay in Washington, D.C., for a few days afterward.”⁸

The Telegraph further reported, “Labour activists who want to help with the Harris campaign have been told they will need to pay for their own flights and car hire but that Democrat volunteers would provide accommodation” and that “[a]ny staff intending to travel are expected to book annual leave for the duration of their trip.”⁹

II. Legal Background

As Justice Kavanaugh wrote while serving as a judge on the D.C. Circuit, “[T]he Supreme Court has drawn a fairly clear line: The government may exclude foreign citizens from activities ‘intimately related to the process of democratic self-government.’” *Bluman v. Federal Election Commission*, 800 F.Supp.2d 281, 287 (D.D.C. 2011) (Kavanaugh, J.).

Foreign nationals are prohibited from “directly or indirectly” making “a contribution or donation of money or other thing of value, or to make an express or implied promise to make a contribution or donation, in connection with a Federal, State, or local election” or an independent expenditure in support of a U.S. candidate.¹⁰

U.S. candidates may not “solicit, accept, or receive a contribution or donation.”¹¹

The term “foreign national” includes both individuals who are not citizens or lawful permanent residents of the United States and “foreign political parties.”¹²

In addition, under Commission regulations “[a] foreign national shall not direct, dictate, control, or directly or indirectly participate in the decision-making process of any person, such as a corporation, labor organization, political committee, or political organization with regard to such person's Federal or non-Federal election-related activities.”¹³

⁷ Dominic Penna & Tony Driver, *Republicans ‘outraged’ as Labour sends 100 staff to help Harris*, Telegraph (Oct. 17, 2024), <https://www.telegraph.co.uk/politics/2024/10/17/labour-sends-staff-help-democrats-us-election-kamala-harris/>.

⁸ See *supra* note 5.

⁹ See *supra* note 7.

¹⁰ 52 U.S.C. § 30121(a)(1); 11 C.F.R. § 110.20.

¹¹ 52 U.S.C. § 30121(a)(2).

¹² 52 U.S.C. § 30121(b); 22 U.S.C. § 611(b)(1).

¹³ 11 C.F.R. § 110.20(i).

While the Commission has previously determined that the volunteer exemption allows foreign nationals to volunteer in U.S. elections, they may not be compensated, foreign nationals may not make expenditures, and they may not direct or control activities of U.S. campaigns.¹⁴

III. Analysis

There is sufficient evidence to support a reason to believe finding that the British Labour Party made, and the Harris campaign accepted, illegal foreign national contributions.

MUR 7035 (Australian Labor Party) is particularly illustrative. In that matter, the Australian Labor Party (“ALP”) established an international program to send delegates to “engage with progressive, social democratic, and Labor parties.”¹⁵ The ALP then contacted Bernie 2016 (“Bernie”), the principal campaign committee for then-Democratic presidential candidate Senator Bernie Sanders, who agreed to accept several “delegates to be placed with the campaign.”¹⁶ ALP paid for “delegates” flights and a daily stipend.¹⁷ “ALP delegates engaged in hands-on activity while placed with the Committee, including encouraging voter attendance at campaign events, recruiting volunteers, canvassing with volunteers, and planning events,” which the Commission determined constituted campaign services to Bernie. Based on these facts, the Commission determined that ALP and Bernie violated the foreign national prohibition and assessed each a civil penalty of \$14,500.¹⁸

The British Labour Party appears to be following the same model as the ALP. Ms. Patel is the head of operations, and her LinkedIn posts indicate that she is speaking as a representative of the party.

The language of her post supports a reasonable inference that the Labour Party will finance at least travel and facilitate room and board. To wit, Ms. Patel states, “we [presumably, the Labour Party] will sort your housing.”

Ms. Patel also states that she “ha[s] 10 spots available.” The limited number of “spots” supports a reasonable inference that the Labour Party is financially supporting this effort. After all, if individuals were being asked to volunteer on their own and sort out their own housing, there would be no reason to cap the number of remaining “spots.” The 10 spot number suggests scarcity, which in turn suggests an expenditure of resources.

¹⁴ See generally MURS 5987, 5995, & 6015 (Hillary Clinton for President).

¹⁵ See MUR 7035 (Australian Labor Party), Conciliation Agreement at ¶ 3, available at <https://www.fec.gov/files/legal/murs/7035/18044437382.pdf>.

¹⁶ *Id.* at ¶ 4.

¹⁷ *Id.*

¹⁸ MUR 7035 (Australian Labor Party), Conciliation Agreement, available at <https://www.fec.gov/files/legal/murs/7035/18044437382.pdf>; MUR 7035 (Bernie 2016), Conciliation Agreement, available at <https://www.fec.gov/files/legal/murs/7035/18044437388.pdf>.

Press reports further support a reasonable inference that the Harris campaign is aware of these efforts, and thus has accepted a prohibited foreign national contribution. As the Washington Post story indicates, there are close ties between the Harris campaign and the Labour Party. It strains credulity that the Labour Party would deploy 100 people to assist the Harris campaign without the campaign's knowledge.

It is true that the Telegraph article suggests "Labour activists" are "volunteers," responsible for their own travel and board. However, the Telegraph article draws a distinction between "Labour activists" and "staff," creating ambiguity as to whether these conditions also apply to paid staff.¹⁹ In addition, these claims are unattributed in the Telegraph article, while LinkedIn posts and emails supporting a contrary inference are attributed to Ms. Patel. Anonymous, self-serving statements do not overcome the reasonable inference from the clear public record that an investigation is necessary and appropriate.

Moreover, even if the individuals traveling to the United States were "volunteers," the Labour Party appears to be using party resources, including paid staff time, to coordinate their travel.

Next, there is reason to believe that foreign nationals are exercising direction and control over elements of the Harris campaign. The Washington Post story suggests that Labour Party officials are closely advising the Harris campaign. The similarity in messaging between the Harris campaign and the Labour Party supports a reasonable inference that this advice is influencing campaign messaging and resource allocation.

IV. Conclusion

Those searching for foreign interference in our elections need to look no further than Ms. Patel's LinkedIn post. The interference is occurring in plain sight.

Ms. Patel's posts and press reporting surrounding the relationship between the Harris campaign and the Labour Party create a reasonable inference that the Labour Party has made, and the Harris campaign has accepted, illegal foreign national contributions.

To protect our democracy from illegal foreign influence, it is imperative that the Federal Election Commission open a MUR, find reason to believe, and investigate this matter immediately.

¹⁹ Compare "Labour activists who want to help with the Harris campaign have been told they will need to pay for their own flights and car hire but that Democrat volunteers would provide accommodation" with "Any staff intending to travel are expected to book annual leave for the duration of their trip."

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief:

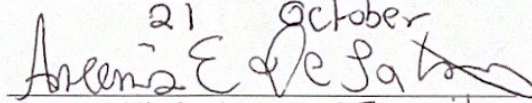
Executed on October 21, 2024



Gary Lawkowski
Deputy General Counsel
Donald J. Trump for President 2024, Inc.

State of Florida
City/County of Palm Beach

Subscribed and sworn to before me on this ~~2nd~~ day of ~~August~~, 2024.

21 October

Notary Public for the State of Florida
My Commission Expires 01/31/28

